

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOINT STATUS REPORT

The UNITED STATES OF AMERICA, by its attorney, JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, and Defendant JEREMIAH HARRIS, by his attorneys TODD S. PUGH and JOSHUA G. HERMAN, submit this joint status report pursuant to the Court's August 4, 2021, Order (R. 44).

1. On December 10, 2020, the defendant was charged by indictment with three counts of sexual exploitation of a child, in violation of 18 U.S.C. §2251(a) (Counts 1, 4, 5, and 6), one count of enticement, in violation of 18 U.S.C. §2422(b) (Count 2), one count of receipt of child pornography, in violation of 18 U.S.C. §2252A(a)(2)(A) (Count 3), and one count of travel with the intent to engage in illicit sexual conduct with a minor, in violation of 18 U.S.C. §2423(b) (Count 7). (R. 28). The defendant has been detained pending trial.

2. The government has produced an extensive amount of discovery to the defendant as a result of this investigation.

3. Counsel for the defendant continue to review the discovery and consult with the defendant. Counsel for the defendant note that the logistical issues caused by the COVID-19 pandemic have caused delay in their ability to review discovery and meet with their client.

4. Counsel for the defendant have also engaged multiple expert witnesses as part of its investigation of the offense. Due to COVID-19 related restrictions at the MCC, access to the defendant by these expert witnesses has been delayed. However, all but one expert has had sufficient access to the defendant as of today's date. It is expected that the last necessary expert witness will meet with the defendant at the MCC before the end of October. Counsel for the defendant anticipates being in a position to advise the Court as to the anticipated resolution of this matter at the next status hearing.

5. Counsel for the government and for the defendant suggest a status date in 60 days.

6. Defendant has no objection to the exclusion of time under the Speedy Trial Act to the next court date.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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